

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE ALTA MESA RESOURCES, INC.
SECURITIES LITIGATION

No. 4:19-cv-00957

ALYESKA MASTER FUND, L.P.,
ALYESKA MASTER FUND 2, L.P., and
ALYESKA MASTER FUND 3, L.P.,

Judge George C. Hanks, Jr.

Plaintiffs,

No. 4:22-cv-01189

v.

ALTA MESA RESOURCES, INC., *et al.*

Defendants.

ORBIS GLOBAL EQUITY LE FUND
(AUSTRALIA REGISTERED), ORBIS
GLOBAL EQUITY FUND (AUSTRALIA
REGISTERED), ORBIS GLOBAL
BALANCED FUND (AUSTRALIA
REGISTERED), ORBIS SICAV, ORBIS
INSTITUTIONAL GLOBAL EQUITY
L.P., ORBIS GLOBAL EQUITY FUND
LIMITED, ORBIS INSTITUTIONAL
FUNDS LIMITED, ALLAN GRAY
AUSTRALIA BALANCED FUND,
ORBIS OEIC, and ORBIS
INSTITUTIONAL U.S. EQUITY L.P.,

No. 4:22-cv-2590

Plaintiffs,

v.

ALTA MESA RESOURCES, INC., *et al.*,

Defendants.

**UNOPPOSED MOTION TO EXTEND DEADLINE
FOR BAYOU CITY ENERGY AND WILLIAM MCMULLEN TO FILE RESPONSE TO
MOTION TO UNSEAL**

Defendants Bayou City Energy and William McMullen respectfully submit this unopposed motion to extend the date for Bayou City Energy and Mr. McMullen to file a response to *Class Plaintiffs' Motion to Unseal Defendant McMullen's Motion for Summary Judgment and Accompanying Exhibit* [Dkt. 442]. The current response deadline is October 11, 2023. Bayou City Energy and Mr. McMullen request until October 20, 2023.

Good cause exists for an extension. The parties have conferred (and continue to do so) regarding the motion to unseal in an effort to narrow the dispute between them. As part of those efforts, the Defendants¹ have already agreed that the following exhibits to Mr. McMullen's motion for summary judgment may be unsealed: Ex. F, G, H, I, J, K, L, M. Bayou City Energy and Mr. McMullen are continuing to analyze what portions of the two remaining sealed exhibits (Exs. A and D) may be unsealed and what portions they contend must remain under seal, and why. In each case, Bayou City and Mr. McMullen have also agreed to file redacted exhibits in an effort to reduce the amount of sealed information on the docket.

No party will suffer any prejudice from a response being submitted by October 20, 2023 instead of October 11, 2023.

Counsel for Class Plaintiffs is unopposed to granting Bayou City Energy and Mr. McMullen until October 20, 2023 to respond to the motion to unseal.

¹ Bayou City Energy and Mr. McMullen did not designate these documents confidential and they do not oppose unsealing them. Counsel for Bayou City Energy and Mr. McMullen conferred with counsel for the other defendants (represented by Quinn Emmanuel, Latham Watkins, Winston Strawn, and Eversheds Sutherland), and they confirmed on October 5, 2023 that they also do not oppose unsealing these exhibits.

DATED: October 5, 2023

/s/ Nick Brown

Nick Brown

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*Counsel for Bayou City Energy Management, LLC
and William McMullen*

CERTIFICATE OF SERVICE

I certify that the foregoing document was served on all counsel of record via the Court's electronic filing system on October 5, 2023.

/s/ Nick Brown

Nick Brown